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January 27, 2003

VIA E-MAIL

Robert C. Feldmeier
Foley & Lardner
321 N. Clark Street
Chicago, IL 60610

Re: Docket No. 02-0277

Dear Bob:

This letter responds to yours of Jan. 24, 2003.

In the event you wish to review Eimer Stahl Klevorn & Solberg's pleadings file in the Cook County Circuit Court litigation, please feel free to contact Scott Solberg at 312.660.7666 for an appointment. We understand that these materials will be made available to you upon request, and you do not need to contact us prior to any review of these documents.

In our letter of Jan. 21, 2003, we advised you based on our discussions with Eimer Stahl that we are unaware of materials responsive to Data Request 1.05 in Eimer Stahl's files for specific categories of non-privileged litigation documents. With respect to any other non-privileged documents in Eimer Stahl's files associated with the Cook County litigation, we would need to review Eimer Stahl's files ourselves prior to the production of any such materials in this docket.

As I have stated in our prior conversations, such a review reasonably will not produce documents relevant to this docket. My expectation is that the documents to be produced, if any, would consist of routine correspondence between counsel to the Cook County litigation concerning scheduling and the like. Therefore, in the interest of avoiding inefficient discovery, we are requesting that you accept without waiver at this time our response to Data Request 1.05, as supplemented, subject to your pending motion.

Robert C. Feldmeier
January 27, 2003
Page 2

Please advise if you would be willing to proceed with respect to Data Request 1.05 as proposed above. If not, we will make arrangements to review Eimer Stahl's files for non-privileged materials not previously addressed in our response and make any such materials available to you. Thank you.

Very truly yours,

SONNENSCHN NATH & ROSENTHAL

A handwritten signature in black ink, appearing to read "Tom Andreoli". The signature is fluid and cursive, with the first name "Tom" and last name "Andreoli" clearly distinguishable.

By:

Thomas A. Andreoli

TAA/js

cc: Service List (w/att. via e-mail)
Scott Solberg (w/att. via e-mail)
Christine Johnson (w/att. via e-mail)